

**COFFEY | BURLINGTON**  
ATTORNEYS AT LAW

**KENDALL COFFEY**

kcoffey@coffeyburlington.com

2601 South Bayshore Drive, Penthouse

Miami, Florida 33133

T.305.858.2900 F.305.858.5261

[www.coffeyburlington.com](http://www.coffeyburlington.com)

January 28, 2022

**Via ECF**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

RE: *United States v. Kozel*, Case No. 19-cr-460-KMW  
Requesting extension of February 25, 2022 surrender date

Dear Judge Wood:

We write on behalf of Todd Kozel to request a one month further extension of the February 25, 2022 surrender date to March 25, 2022 to allow for the completion of further medical procedures. He also needs significant dental work as a result of the radiation damage to his jaw, work that can be completed within 60 days, and this substantial expense and added complication should not be a burden on a federal institution.

We are advised by Madalyn Toledo of U.S. Pretrial Services that Mr. Kozel appeared at 10:00 AM on January 27 and that his ankle monitor was successfully installed.

The Government has advised us that they oppose this request.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/Kendall B. Coffey

Kendall B. Coffey  
*Counsel for Todd Kozel*

cc: Louis Pellegrino, AUSA  
Olga Zverovich, AUSA  
Madalyn Toledo, U.S. Pretrial Services  
Marlon Ovalles, U.S. Pretrial Services  
Paul Hay, U.S. Probation